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 cc: Philip Woods/R9/USEPA/US@EPA, Karen Schwinn/R9/USEPA/US@EPA
 Subject: comments on Water Quality Targets Matrix in Draft WQPP

Rick & Judy:

As I mentioned in my 2/13 comments to you on the draft WQPP, I passed a copy of Table 5 (CALFED Water Quality Targets for Parameters of Concern) from the Water Quality Program Plan on to EPA staff in our standards and permits office. They highlighted a couple of issues\concerns that I want to pass on to you.

1) While the other targets listed are generally consistent with the California Toxics Rule (CTR), there are no human health numbers listed for a number of parameters that were included in the CTR. In several cases, these numbers are much lower than the aquatic life criteria included in the matrix. These include:

Parameter	Human Health Criteria (based on 30-day average)
PCB	.00017 ug/l
DDT	.00059 ug/l
chlordan	.00057 ug/l
toxaphene	.00073 ug/l
Hg (total)	.05 ug/l

2) The narrative in the matrix identifies numbers for the Delta both east and west of the Antioch Bridge. This appears to capture the distinctions between the Central Valley and San Francisco Regional Water Quality Control Board Basin Plans. However, the actual boundary between the two Regional Boards is Collinsville, which is a fair bit west of the Antioch Bridge.

3) For the water numbers listed for PCBs (p. 41) in each of the regions, the text following should read "(sum of congeners)", not "each of 7 congeners". (This error originally occurred in the publication of the National Toxics Rule, but was corrected in the California Toxics Rule.)

4) The matrix doesn't include any toxicity targets for the Sacramento and San Joaquin Rivers (p. 45 - "Toxicity of Unknown Origin"). Similar to what was included for the Delta region west of the Antioch Bridge, we suggest including the narrative text from the Central Valley Regional Board's Basin Plan for toxicity (p. III-8.00) which reads "All waters shall be maintained free of toxic substances in concentrations that produce detrimental physiological responses in human, plant, animal, or aquatic life...Compliance with this objective will be determined by analysis of indicator organisms, species diversity, population density, growth anomalies, and biotoxicity tests of appropriate duration or other methods as specified by the Regional Water Board."

5) The matrix also doesn't include any targets for nutrients (nitrate) for the San Joaquin and Sacramento Rivers (p. 43). We suggest using the same number (10 mg/l) as was used for the Delta at drinking water intakes. (This number derives from EPA's and the State's MCL for treated water.)

6) For selenium (p. 39), the table should also list criteria adopted by the Central Valley Regional Board in May 1996 for two important tributaries of the San Joaquin River. Specifically, the Board adopted the following water quality objectives for selenium:

Mud Slough (north) and 5 ug/L (based on 4-day average)

San Joaquin River from Sack dam to Vernalis
Salt Slough and Grassland Watershed wetland channels

2 ug/L

The former appears to be covered by the entry for "South of Merced River", but the latter objective for Salt Slough and the Grassland Watershed wetland channels should be included in this matrix.

Hope this information is helpful.

Gail

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